

Susan Payne Woodrow, JD, PC

3631 Dorothy Lane, Waterford, Michigan, 48329
e-mail: suzywoodrow@hotmail.com; spwoodrowjd@gmail.com

Licensed in:
Tennessee
Michigan
Florida

PH: (248) 623 1818
FX: (248) 623 1811
2 February 2012

The Honorable Thomas L Ludington
U.S. District Court – Eastern Division, Northern District
PO Box 913
Bay City, MI 48707

Dear Judge Ludington:

RE: 11-13381, AVKO Educational Research Foundation v Thomas Morrow et al

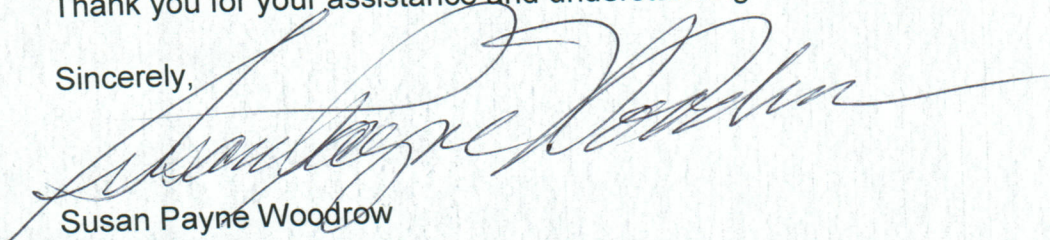
I agree that the complaint was to be revised. However, the time frames mentioned were 14 days for Plaintiffs to brief the law at issue with 14 days for Defendants to respond. The Court set no time limit for the amended complaint; but, I recall I suggested three to four weeks. I have attached a proposed order as well as the proposed order denying Defendants Motion to Enter Default.

Further, Mr. McCabe attempted to get the bond recently with their local insurance agency unsuccessfully. I referred him to Brunswick Company. Brunswick's underwriter was concerned that there was no order issued. When they asked Mr. McCabe for a supporting order, he sent them the Defendants' proposed Judgment of Settlement. Mr. McCabe then submitted their completed form to Brunswick Company today at 9:15 a.m. They contacted me about the Settlement Order and I then sent them a copy of the transcript of the February 23, 2012 hearing, noting the pages where you indicated a \$75,000 bond.

While drafting this letter, I received a phone call and e-mail that the bond is in place, needing only to be invoiced and paid. Shall we proceed with the bond?

Thank you for your assistance and understanding.

Sincerely,



Susan Payne Woodrow

Cc: John DiGiacomo, 866.936.7447, john@traverselegal.com
Donald McCabe, donmccabe1@AOL.com

Susan Woodrow <spwoodrowjd@gmail.com>



RE: Bond Approval - AUKO Educational Research Foundation, INC.
1 message

Tue, Mar 27, 2012 at 2:22 PM

Mark Levinson <mlevinson@brunswickcompanies.com>

To: Susan Woodrow <spwoodrowjd@gmail.com>

Susan,

Please be advised the Hartford has approved the issuance of the \$75,000 Injunction bond with an annual premium of \$1,875. We can release the bond upon receipt of the premium.

Upon notification that you want to proceed, I will issue the invoice.

Regards,

Mark Levinson

Senior Vice President - Brunswick Companies

(P) 330-865-4265

(F) 330-864-8661

From: Susan Woodrow [mailto:spwoodrowjd@gmail.com]

Sent: Tuesday, March 27, 2012 12:40 PM

To: Mark Levinson; Don McCabe; Bob McCabe; Barry Chute; Susan Woodrow

Subject: Re: Transcript

Mark,

Attached is the transcript.. I direct your attention to pages 116, **128, lines 19 - 22.**

We were to have the bond by 5:00 yesterday, or have the Motion for Temporary Injunction dismissed. I hope he will accept a late bond. If not, could we have a refund of all or a portion of the fee?

Thank you very much.

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Susan

On Tue, Mar 27, 2012 at 11:25 AM, Mark Levinson <mlevinson@brunswickcompanies.com> wrote:

Susan,

Please send me the discussed transcript.

Thanks

Mark Levinson
Senior Vice President - Brunswick Companies
(P) 330-865-4265
(F) 330-864-8661

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Susan Payne Woodrow

Susan Payne Woodrow, JD PC

PH: 248 623 1818

FX: 248 623 1811

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